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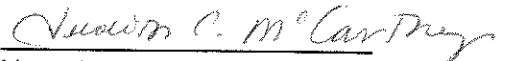
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May 29, 2024

Via ECF

The Honorable Judith C.
McCarthy United States
Magistrate Judge Southern
District of New York
300 Quarropas Street
White Plains, New York 10601

APPLICATION GRANTED


Hon. Judith C. McCarthy
5-29-2024

Re: United States v. Justine Ying
Case No.: 7:22-mj-03841-UA-4

Dear Judge McCarthy:

The undersigned has been appointed to represent Ms. Justine Ying in the above-captioned matter. The defendant, Justine Ying, respectfully moves, pursuant to 18 U.S.C. § 3145(a)(2), to amend the conditions of her release. Ms. Ying seeks an Order of the Court permitting her to travel outside of the Southern District of Florida for employment purposes. Undersigned was contacted by Ms. Ying's Probation Officer, Mackenzie Hilaire, from the Southern District of Florida who stated that Ms. Ying's employer has made last minute changes to her job responsibilities that are now requiring her to travel outside of the Southern District of Florida. Officer Hilaire indicates that she has no objection to the modification as long as Ms. Ying provides advance notice of the out-of-district travel plans. The undersigned has also spoken to United States Attorney Steven Kochevar, who has indicated that the government does not object to the requested modification.

WHEREFORE, the defendant moves that the Court issue an Order of the Court permitting the defendant to travel outside of the Southern District of Florida for employment purposes only, subject to the conditions imposed by her probation officer.

RESPECTFULLY SUBMITTED,

THE DEFENDANT,
JUSTINE YING

Respectfully submitted,
/s/ *Bruce D. Koffsky*

BDK/lis